UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
MAERSK, INC., and A.P. MOLLER-MAERSK, A/S		
Plaintiffs,	:	
-against-	:	05 CIV 4256 (CM)
NEEWRA, INC, REDNIHOM, INC., AREF HASSAN ABUL INC., ARWEEN SINGH SAHNI a/k/a ARWEEN SAHNI		05 CIV 4356 (CM)
SINGH, a/k/a ARWEEN SAHNI a/k/a ARWEEN SINGH a/k/a ABUL SABAH a/k/a AREF HASSAN ABUL, MOHINDER	:	
SINGH SAHNI a/k/a MOHINDER SAHNI SINGH a/k/a MOHINDER SAHNI a/k/a MOHINDER SINGH a/k/a	:	
MOHINDER SINGH SAHANI a/k/a MOHINDER SAHANI a/k/a MOHINDER SAHANI SINGH, a/k/a JOGINDER SINGH		
SAHNI, JOGINDER SINGH SAHNI, a/k/a JOGINGER SINGH SAHNI a/k/a JOGINDER SAHNI SINGH a/k/a JOGINGER SAHNI SINGH a/k/a JOGINDER SINGH a/k/a JOGINDER	:	
SAHNI a/k/a JOGINGER SINGH a/k/a JOGINGER SAHNI, SABHARWAL CHANDRA KUMAR a/k/a SABHARWAL K.	:	
CHANDRA, MANDEEP SINGH SAHNI a/k/a MOHINDER SINGH a/k/a MOHINDER SAHNI a/k/a MOHINDER SINGH	:	
SAHANI, HELP LINE COLLECTION CO. W.L.L., PARKER DAWOOD TAJUDDIN TAJUDIS ISMAIL PARKER,	:	
SARDAR TRADERS EST., SARDAR INTERNATIONAL TRADING CO., AL TAMASOK AL ARABI EST., JOHN DOE 1-100 (fictitious) and JOHN DOE INC.1-100 (fictitious)	:	
Defendants.	:	
	-x	
DEFENDANTS' STATEMENT PURSUANT <u>TO LOCAL CIVIL RULE 56.1</u>		
Defendants Joginder Singh Sahni, Dawood Tajuddin Parkar, and Help Line		

Defendants Joginder Singh Sahni, Dawood Tajuddin Parkar, and Help Line

Collection Co., W.L.L., for their Statement pursuant to Local Civil Rule 56.1, allege that
there is no genuine issue to be tried with respect to the following facts:

- 1. There is no competent relevant evidence in this case tending to prove that defendant Joginder Singh Sahni participated in any conspiracy to defraud plaintiffs.
- 2. There is no competent relevant evidence in this case tending to prove that defendant Dawood Tajuddin Parkar participated in any conspiracy to defraud plaintiffs.
- 3. There is no competent relevant evidence in this case tending to prove that defendant Help Line Collection Co. participated in any conspiracy to defraud plaintiffs.

Dated: New York, N.Y. March 30, 2009

HARRY H. WISE, III (HW6841)

Attorney for Defendants Joginder Singh Sahni, Dawood Tajuddin Parkar, Help Line Collection Co. Sardar Traders Est., and Sardar International Trading Co., W.L.L. 500 Fifth Avenue, suite 1650 New York, N.Y. 10110 (212) 810-2430, ex. 302 (212) 810-2427 (fax)